UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region I - EPA New England

Drafted Date: May 14, 2013
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SUBJECT: Full Compliance Evaluation of Cold Brook Energy, Hampden, Maine

FROM: Elizabeth Kudarauskas, Environmental Engineer, Air Technical Unit EAK 6/6/13

THRU: Christine Sansevero, Senior Enforcement Coordinator, Air Technical Unit CMS 6/10/13

TO: File

I. Facility Information
A. Facility Name: Cold Brook Energy
B. Facility Location: 809 Main Road North, Hampden, Maine 04444
C. Facility Mailing Address: same
D. Facility Contact: Kevin Fish, Terminal Manager
E. Type of Source (major/minor/sm/sm80): Synthetic Minor 80%
F: Date Title V permit issued: NA
G: AFS #:

II Background Information
A. Date of inspection: May 9, 2013
B. Weather Conditions: overcast, few sprinkles, temperatures in the 60's
C. US EPA Representative(s):
Beth Kudarauskas, Air Tech Unit, OES
Bill Osbahr, OEME
D. State Representative(s): none

III Purpose of Inspection
The purpose of this inspection was to evaluate applicability and compliance of Cold Brook Energy Terminal with respect to the Subpart R and Subpart BBBBBB MACT regulations for gasoline storage and distribution. In addition, EPA conducted monitoring to determine whether excess VOC emissions were being emitted from the facility.

EPA also used the inspection to gather information on the storage and distribution of #6 oil and asphalt at the Cold Brook Energy Terminal in Hampden, Maine.

IV Facility Description

A. Company / Facility History
The Cold Brook Energy Terminal in Hampden, Maine is a petroleum storage and distribution terminal. Products stored on-site include gasoline, ethanol, diesel and home heating oil. The terminal is equipped with a vapor combustion unit to control emissions from the storage and distribution of gasoline.

B. Corporate Structure and CEO/President/owner name and mailing address
Cold Brook Energy is owned by Dysarts and Daigle Oil. Each parent company owns 50%.

C. Number of Employees and Working Hours
The facility loading operations are conducted 24 hours a day, 7 days a week. Cold Brook Energy Terminal currently employs approximately 3 people at the terminal. Staff are on-site from 4am to 8pm Monday through Friday and 4am to 2pm on Saturday. Otherwise, the terminal had a security service on-site.

V Inspection

A. Entry
The EPA inspectors arrived unannounced at the Cold Brook Energy Terminal facility located on Main Road North at 9:00 am. The EPA inspectors (Ms. Kudarauskas and Mr. Osbahr) showed their credentials to Mr. Reginal Mitchell and Mr. Kevin Fish (upon his arrival) of Cold Brook Energy.

The inspectors were informed by Mr. Mitchell that Mr. Fish, the terminal manager was at an off-site meeting. Mr. Mitchell expected Mr. Fish to return to the terminal at noon. Mr. Mitchell stated that only Mr. Fish knew where the records were kept and asked the inspectors to delay the inspection until Mr. Fish returned.

Mr. Mitchell called Mr. Fish on his cell phone. Mr. Osbahr spoke to Mr. Fish on the phone to explain the purpose and scope of the inspection. Mr. Fish allowed the inspectors to conduct a facility tour with Mr. Mitchell and use the FLIR camera to identify sources of vapor leaks. The inspectors agreed to wait for Mr. Fish to return to conduct the records review portion of the inspection.

B. Opening Conference

Because the terminal manager, Mr. Fish, was not at the terminal when the inspectors first arrived, the opening conference was conducted in conjunction with the records review, after the facility tour.

There are no emergency generators, parts washers or degreasers at the facility.

C. Plant Walkthrough

The inspectors conducted a walkthrough of Cold Brook Energy's Terminal on May 9, 2013.

Mr. Mitchell first led the inspectors into the tank farm. Cold Brook Energy currently has the following products stored on-site:

Tank ID	Product
44	Low Sulfur Diesel
66	Ethanol (or Regular Gasoline)
93	2 oil
91	2 oil
92	2 oil
90	Premium Gasoline
89	Kerosene (or 2 oil)
9	Regular Gasoline
35	Kerosene

Mr. Mitchell then led the inspectors to the pipeline building. Cold Brook energy receives all products via pipeline. At the time of the inspection, Mr. Mitchell stated that the facility was receiving a shipment of regular gasoline. Mr. Mitchell explained that Cold Brook Energy tests the gravity of product in the pipeline to determine product changeover in the pipeline.

Mr. Mitchell pointed out the vapor lines and the vapor knockout tank that is in line before the vapors go to the vapor combustion unit. Trucks were loading gasoline at the loading rack and the vapor combustion unit was operating at the time of the inspection.

Mr. Mitchell stated that the facility had conducted an annual emissions test on the vapor combustion unit 2 weeks before the inspection. The emissions test was required by the facility's state permit and ME DEP was on-site to witness the test.

Mr. Osbahr and Ms. Kudarauskas climbed Tank 9, the tallest tank at the facility, to get the best view of the facility. From the top of Tank 9, Mr. Osbahr used the FLIR camera to scan the facility for vapor leaks. No vapor leaks were detected with the FLIR from the top of Tank 9.

Mr. Osbahr explained that he planned to test the pressure in the vapor collection system and check the pressure vacuum relief vent (PVRV) for vapor leaks. To test the pressure in the vapor line, the inspectors measure the pressure at the loading rack. The loading rack is the point in the system where the highest pressure is expected. To measure pressure, a coupling is connected in the vapor line between the tank truck and the facility flexible vapor hose. A pressure gauge is attached to the coupling to display the pressure during truck loading.

The inspectors attached the pressure coupling to a truck loading 8,000 gallons of gasoline in Bay 3. The truck used to measure pressure was Dysarts Truck Service, Tank 96. During loading Ms. Kudarauskas observed a maximum pressure of 5 inches water. Mr. Osbahr did not detect any leaks from the PVRV during truck loading.

D. Records Review

Mr. Fish arrived at the facility just as the inspectors finished the field work portion of the inspection. He led the inspectors to his office to discuss facility operations and review records.

Mr. Fish explained the ownership structure of Cold Brook Energy. He explained that Cold Brook Energy owns the property and the equipment but Citgo owns the gasoline.

Mr. Fish stated that the facility had recently updated the SPCC plan including facility maps. Mr. Fish stated that the consultant was currently updating the facility FRP plan, which would include the new maps.

Mr. Fish provided an updated facility map for the inspectors to look at during the inspection. Ms. Kudarauskas noticed the dock on the map and asked if the facility ever received product by ship or barge. Mr. Fish stated that the last barge to deliver product to the facility was in 2001. The barge delivery in 2001 was the result of a problem with the pipeline. The last barge to deliver product before 2001 was in 1998. In 1998, Cold Brook Energy began receiving all products by pipeline. The facility has maintained the dock to be able to receive product in the event that the pipeline is out of service, as happened in 2001. Mr. Fish stated that the facility is the process of getting the dock into caretaker status. To accomplish this non-operating condition, Mr. Fish explained that certain requirements must be met, including draining all the lines out to the dock.

Mr. Fish stated that the facility has a total of four truck loading bays. Two bays are bottom loading bays for loading gasoline, ethanol, or switch loading. The other two bays are top loaded for distillate oils.

Mr. Fish stated that the loading rack was installed in 1991 and the vapor combustion unit (VCU) was installed in 1992.

Mr. Fish provided Ms. Kudarauskas with a copy of the facility throughput records for 2011 and 2012. The throughput data for 2012 is listed in the table below. Ms. Kudarauskas also reviewed

the throughput data for 2011, and it was similar to that of 2012.

Cold Brook Energy Gasoline and Ethanol Throughput (gallons) 2012			
	Regular Gasoline	Premium Gasoline	Ethanol
January	4,934,175	216,545	573,738
February	5,055,383	263,531	591,886
March	5,018,390	215,616	576,940
April	4,884,514	160,380	558,235
May	5,008,519	222,175	578,859
June	5,763,577	276,000	668,746
July	6,056,388	248,444	696,824
August	6,325,493	320,150	735,606
September	5,474,827	218,076	631,944
October	5,815,013	264,369	675,099
November	5,564,459	191,763	640,081
December	6,071,726	260,917	703,681

Although the test results were not available for the most recent emissions test, Mr. Osbhar reviewed the records for the stack test conducted in 2012.

Mr. Fish stated that there is no temperature or hydrocarbon monitoring on the VCU. Mr. Fish stated that he did not think that Cold Brook Energy was required to install any monitoring devices to comply with Subpart BBBBBB because the facility has an interlock that will shut down the loading rack if no pilot light is detected on the VCU. Mr. Fish believes that this interlock is adequate to meet the monitoring requirements of Subpart BBBBBB.

Mr. Fish stated that the facility uses a consultant, CES to calculate the facility-wide annual emissions using the Tanks Program.

Ms. Kudarauskas asked Mr. Fish to pull the vapor tightness certification for Dysarts Tank 96. Mr. Fish pulled the vapor certification for the tanker, which was dated 4/25/2012. Ms. Kudarauskas stated that the truck certification is only good for one year, and asked Mr. Fish if he had a more recent certification on file. Mr. Fish called Dysarts and had a new truck certification faxed over. The date of the new truck certification was 4/24/2013.

Mr. Osbahr asked if the facility had any type of interlock system whereby a truck could not load

gasoline unless a current tanker tightness certification was on file at the facility. Mr. Fish stated that the facility computer system had the ability to implement a lockout based on truck certifications; however, Cold Brook Energy did not currently utilize this option. Mr. Fish stated that he typically receives and files all the tanker certifications.

Ms. Kudarauskas reviewed the daily terminal inspection records for 2011 through 2013. Ms. Kudarauskas reviewed the weekly inspection checklists and the monthly sight, sound and smell inspections. Mr. Fish provided records of tank and loading rack inspection records as well as floating roof inspection logs, LEL measurements, and tank alarm test records. Mr. Fish maintains all terminal inspection records. He stated that he does the inspections himself.

Ms. Kudarauskas asked to see the most recent 10 year API 653 inspection report for Tank 90. Mr. Fish produced a report from November 2008, for the inspection conducted by Enterprise engineering. The report recommended the replacement of the internal floating roof pan.

Mr. Fish stated that Cold Brook Energy does not have any #6 oil or asphalt.

E. Closing Conference

The inspectors conducted a brief closing conference at the end of the inspection. Ms. Kudarauskas completed the multimedia checklist. Ms. Kudarauskas told Mr. Fish that she planned to look into the monitoring requirements of subpart BBBBBB, and would be in touch if additional monitoring was necessary. Otherwise, the inspectors told Mr. fish that no significant vapor leaks were detected at the facility using the FLIR camera.

The inspectors thanked Mr. Fish and Mr. Mitchell for their time and left the facility at approximately 12:30 am.